

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEANDRE BRADLEY)	
)	
Plaintiff,)	Case No. 1:23cv5020
)	
v.)	District Judge Sara L. Ellis
)	
RONALD HAIN et al.,)	
)	
Defendants.)	

**KANE COUNTY DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED
COMPLAINT**

NOW COME defendants Ronald Hain, Kane County, and Corrections Officers Anthony Keaty, Scott McKanna, Mergim Azemi, Joel Directo, Luis Aguirre, Scott Flowers and Perparim Osmani by Kane County State's Attorney Jamie L. Mosser through her assistants Vincent Coyle Elizabeth Tabor, and Erin M. Brady, pursuant to Fed. R. Civ. P. 12(b)(6), and move that this Honorable Court dismiss Plaintiff's First Amended Complaint against them. In support of such Motion, the Kane County Defendants submits their accompanying Memorandum of Law in Support.

Respectfully submitted,
Defendants Sheriff Hain, Kane County, C/O Keaty,
C/O McKanna, C/O Azemi, C/O Directo, C/O
Aguirre, C/O Flowers and C/O Osmani.
By: /s/ Vincent Coyle
One of Their Attorneys

Jamie L. Mosser
Kane County State's Attorney
Erin M. Brady
Elizabeth Tabor
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